

**UNITED STATES DISTRICT COURT  
MIDDLE DISTRICT OF TENNESSEE**  
Nashville Division

Concord Music Group, Inc., et al

Case No. 3:23-cv-01092

v.

Anthropic PBC

Judge Waverly D. Crenshaw, Jr.

**MOTION FOR ADMISSION *PRO HAC VICE***

Pursuant to Rule 83.01 of the Local Rules of Court for the United States District Court Middle District of Tennessee, Nicholas C. Hailey hereby moves for admission to appear *pro hac vice* in the above-captioned action as counsel for Plaintiffs.

Pursuant to 29 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct:

1. I am a member in good standing of the United States District Court for the Eastern District of Virginia. Attached is a Certificate of Good Standing from that court.

2. I am not, nor have I ever been, the subject of disciplinary proceedings by any disciplinary authority, court, or tribunal, except as provided below:

N/A

3. I have not been found in contempt by any court or tribunal, except as provided below:

N/A

4. I have not been sanctioned pursuant to 28 U.S.C. § 1927, except as provided below:

N/A

5. I have never been censured, suspended, disbarred, or denied admission or readmission by any court or tribunal, except as provided below.

N/A

6. I have not been charged, arrested, or convicted of a criminal offense or offenses, except as provided below:

N/A

7. I understand that pursuant to Local Rule 83.01(d)(1), if I am not both a member of the Tennessee bar and admitted to the bar of this Court, local counsel must be retained. Below is the name, address, phone number, and e-mail address of local counsel retained in this matter:

N/A

8. I have read and am familiar with Local Rules of Court for the United States District Court Middle District of Tennessee.

9. By seeking admission to practice before this Court, I acknowledge my responsibility for compliance with all rules of this Court and confer disciplinary jurisdiction upon this Court for any alleged misconduct arising in the course of the proceeding.

/s/ Nicholas C. Hailey Signature

Name: Nicholas C. Hailey

State where admitted and State Bar Number: District of Columbia - 1012012

Business Address: 4530 Wisconsin Ave, NW, Fifth Floor, Washington, DC 20016

Local Address [if different from above]:

Phone: (202) 480-2174

Email: nick@oandzlaw.com

**CERTIFICATE OF SERVICE**

[Include certificate of service in compliance with Local Rule 5.01 and 5.02]

I hereby certify that a true and correct copy of the foregoing Motion for Admission Pro Hac Vice was served via U.S. Mail, postage prepaid, upon:

Anthropic PBC  
c/o Corporation Service Company  
251 Little Falls Drive  
Wilmington, DE 19808

this the 8th day of November, 2023.

s/ Steven A. Riley

**\*\*FEE: \$150.00** [Fee may be paid through the credit card module in ECF or payment may be forwarded to the Clerk within 21 days of filing the motion. If forwarded to the Clerk, payment should be in the form of a check, cashier's check or money order payable to the Clerk, U.S. District Court, 719 Church Street, Suite 1300, Nashville, TN 37203.]